



SEALED

Office of the United States Attorney
District of Nevada
333 Las Vegas Boulevard, Suite 5000
Las Vegas, Nevada 89101
(702) 388-6336

1 DANIEL G. BOGDEN
United States Attorney
2 District of Nevada
Nevada Bar No. 2137
3 DANIEL D. HOLLINGSWORTH
Assistant United States Attorney
4 Nevada Bar No. 1925
United States Attorney's Office
5 333 Las Vegas Boulevard South, Suite 5000
Las Vegas, Nevada 89101
6 Telephone: 702-388-6336
Facsimile: 702-388-6787
7 Email: *daniel.hollingsworth@usdoj.gov*
Attorneys for the United States
8
9
10

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 UNITED STATES OF AMERICA,)
14 Plaintiff,)
15 v.) 2:12-CR-485-GMN-(PAL)
16 HOPE IPPOLITI,)
17 Defendant.)

18 **UNITED STATES OF AMERICA'S SEALED EX PARTE MOTION TO FILE THIS**
19 **MOTION AND THE MOTION TO SUBSTITUTE AND TO FORFEIT PROPERTY OF**
HOPE IPPOLITI UNDER SEAL AND MOTION TO UNSEAL AND ORDER

20 The United States of America ("United States"), by and through Daniel G. Bogden, United
21 States Attorney, and Daniel D. Hollingsworth, Assistant United States Attorney, moves this
22 Honorable Court for an Order to file this Sealed Ex Parte Motion and the Motion to Substitute and to
23 Forfeit Property of Hope Ippoliti under seal pursuant to LCR 47-2(a)¹. This Motion and the Motion
24 to Substitute and to Forfeit property of Hope Ippoliti ("Motion to Substitute") must be filed under
25 seal and ex parte because the Federal Bureau of Investigation needs to take into custody the real
26 properties that the United States is requesting to substitute and to forfeit. The United States fears

¹ "All ex parte motions, applications or requests shall contain a statement showing good cause why the matter was submitted to the court without notice to all parties." LCR 47-2(a)

1 that if this Motion is served on the other party before the properties are taken into custody, Hope
2 Ippoliti may attempt to sell or to lease the real properties. As soon as the Order is signed, the United
3 States will take into custody the properties and will serve Hope Ippoliti.

4 The United States requests this Court to sign the Substitution and Forfeiture Order, file it,
5 and return a copy of the Substitute and Forfeiture Order to the United States under seal as a paper
6 document because the signed and filed sealed document will not be sent to the United States by
7 Electronic Case Filing.

8 Therefore the United States requests this Court to allow this Motion and the Motion to
9 Substitute to be filed under seal, to sign the Substitution and Forfeiture Order, file it, and to return a
10 signed and filed copy of it to the United States under seal as a paper document.

11 After the real properties have been taken into custody and the United States files documents
12 showing that the properties were taken into custody, the United States requests this Court allow the
13 sealed motions and Substitution and Forfeiture Order to be automatically unsealed so that the proper
14 parties may be served.

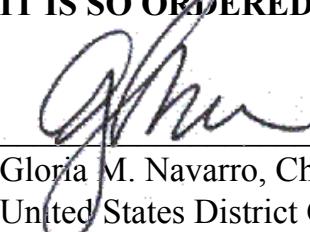
15 DATED this 14th day of May, 2014.

16 Respectfully submitted,

17 DANIEL G. BOGDEN
18 United States Attorney

19 /s/Daniel D. Hollingsworth
20 DANIEL D. HOLLINGSWORTH
21 Assistant United States Attorney

22 IT IS SO ORDERED.
23

24 
25 Gloria M. Navarro, Chief Judge
26 United States District Court

DATED: 05/16/2014